

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re:

Chapter 13

Virginia Fuchs d/b/a One World Reality, LLC
d/b/a Ruby Slippers Holding, LLC,

Case No. 10-34134-JES

Debtor.

Virginia Fuchs d/b/a One World Reality, LLC
d/b/a Ruby Slippers Holding, LLC,

Plaintiff,

v.

Adversary Case No. 11-02168-JES

JPMorgan Chase Bank, N.A.,

Defendant.

ANSWER OF JPMORGAN CHASE BANK, N.A.

The defendant, JP Morgan Chase Bank, N.A., by its attorneys, Gray & Associates, L.L.P., hereby answers the complaint and alleges as follows:

1. That with respect to the allegations contained in paragraph 1, admits the allegations contained therein.

2. That with respect to the allegations contained in paragraph 2, admits the allegations contained therein.

Drafted by:

Jay J. Pitner
Gray & Associates, L.L.P.
16345 West Glendale Drive
New Berlin, WI 53151
Phone: 414.224.8404
Fax: 414.224-1279
Email: jpitner@gray-law.com

Gray & Associates, L.L.P. is attempting to collect a debt on its client's behalf and any information it obtains will be used for that purpose. If you previously received a discharge in a chapter 7 bankruptcy case, this should not be construed as an attempt to hold you personally liable for the debt.

3. That with respect to the allegations contained in paragraph 3, admits the allegations contained therein.

4. That with respect to the allegations contained in paragraph 4, denies the allegations contained therein.

5. That with respect to the allegations contained in paragraph 5, admits the allegations contained therein.

6. That with respect to the allegations contained in paragraph 6, admits the allegations contained therein.

7. That with respect to the allegations contained in paragraph 7, states that it is without sufficient knowledge or information to form a belief as to what the plaintiff was and was not aware of, but admits that the plaintiff did not request a continuation of the stay pursuant to 11 U.S.C. §362(c)(3)(B).

8. That with respect to the allegations contained in paragraph 8, states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations contained and accordingly puts the plaintiff to her strict proof thereof.

9. That with respect to the allegations contained in paragraph 9, states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations contained and accordingly puts the plaintiff to her strict proof thereof.

10. That with respect to the allegations contained in paragraph 10, states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations contained and accordingly puts the plaintiff to her strict proof thereof.

11. That with respect to the allegations contained in paragraph 11, states this paragraph contains a mere list of grounds upon which injunctive relief can be granted and accordingly no responsive pleading is required but, to the extent that a response is required, states that it lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained therein and accordingly puts the plaintiff to her strict proof thereof.

WHEREFORE, the defendant respectfully demands that the court issue an order dismissing the complaint with prejudice, awarding the defendant its fees and costs incurred in defending against this action and such and further relief as the court may deem to be just and equitable.

Dated this 31st day of March, 2011

GRAY & ASSOCIATES, L.L.P.
Attorneys for Defendant

By: _____/s/_____
Jay J. Pitner
State Bar No. 1010692

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WESTERN DISTRICT OF WISCONSIN**

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JPMorgan Chase Bank, N.A.,

Defendant.

AFFIDAVIT OF MAILING

STATE OF WISCONSIN)
)ss
MILWAUKEE COUNTY)

Michelle M. Neil, being first duly sworn on oath deposes and says that she is an employee of the firm of **GRAY & ASSOCIATES, LLP**, attorneys for JP Morgan Chase Bank, N.A., that on the ___31st___ day of March, 2011 she mailed, properly enclosed in a postage paid envelope, copies of the answer addressed to each of the following named persons, at his proper post office address set after his respective name, to wit:

Mr. William H. Green
Attorney at Law
3216 S. 92nd Street, #201
Milwaukee, WI 53227

Ms. Mary B. Grossman
Chapter 13 Trustee
740 North Plankinton Avenue, Suite 400
Milwaukee, WI 53203

US Trustee
517 East Wisconsin Avenue
Room 430
Milwaukee, WI 53202

_____/s/_____
Michelle M. Neil

Subscribed and sworn to before me
this __31st__ day of March, 2011

_____/s/_____
Daphne West, Notary Public
Milwaukee County, State of Wisconsin
My commission expires: 02/10/13